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To: CEQA Guidelines
Subject: OPR CEQA COMMENTS 2015

WATER SUPPLY ANALYSIS IN CEQA

The Richmond Community Association (RCA) in San Francisco supports amending the CEQA checklist in Appendix G to allow local agencies react to major drought conditions such as we have in California's water supply. Adding "and reasonably foreseeable future development during normal, dry and multiple dry years" to the "have sufficient water supplies available to serve the project" reflects these new realities.

RCA understands that each water agency is allowed to have its own methodology for water supply analysis. RCA recommends that OPR work with the Department of Water Resources to establish baseline standards for water supply analysis. RCA further recommends that water agencies should provide the Department of Water Resources, OPR and the general public with all information relating to the methodology that was used. The water agency should also demonstrate that the methodology used is based on sound science and best practices. This information should also be available to the general public.

BASELINE

The baseline guidelines do not take into account the possibility of prolonged lag times between the DEIR and the FEIR. These prolonged lag times could be the result of economic conditions, issues with the project sponsor or the complexity of the project.

There have been instances in San Francisco when the FEIRs have been submitted with data that was seven (7) years old.

CEQA should have provisions for this possibility and require project sponsors to provide data that is current. Current could be defined as data that is four (4) years old or less.

TRANSIT ORIENTED DEVELOPMENT EXEMPTION

RCA strongly opposes SB743. The one size fits all approach for transit oriented development uses Sacramento as the baseline. San Francisco is far different from Sacramento This one size fits all approach will have very negative impacts on San Francisco.

Although Sacramento's urban design mirrors most of California cities, San Francisco's does not. According to the US Census Bureau, San Francisco is the second most densely populated city in the country. San Francisco also has one of the oldest and largest transit systems in California. San Francisco Municipal Railway (Muni) is over 100 years old. Muni has 75 transit lines with more than 3,500 transit stops. Muni has 702,000 weekday boardings (on average) and 3 million hours of transit service annually. Its fleet has 1,053 service vehicles. San Francisco also has a Transit First policy which has been in effect for a number of years. Transit maps appear to indicate that over 90% of San Francisco's landmass is within ½ mile of established transit.

San Francisco Muni has major issues in regard to on-time service, it has failed miserably since on-time goals were established. far below the 1999 voter-mandated goal of 85 percent. In 2014, the on-time service was as low as 60%. The estimated cost of Muni's deferred maintenance is \$2.2 billion dollars. San Francisco needs an effective CEQA process to protect its neighborhoods.

The stated purpose of this exemption is to encourage transit oriented development not penalize municipalities which have already achieved this goal. If over 90% of San Francisco is within ½ mile of transit then over 90% of San Francisco could potentially be eligible for CEQA streamlining. This could have a disproportionate impact on a single municipality. CEQA guidelines should account for this anomaly.

Finally, RCA is opposing the recommendation of exempting certain types of projects that are consistent with a specific plan from further CEQA review. In San Francisco, certain area and neighborhood plans e.g. the Eastern Neighborhoods Plan have had mixed results. Requiring CEQA review for individual projects within a plan area creates a system of checks and balances that should be retained.